

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

REV. XIU HUI “JOSEPH JIANG,)	
)	
Plaintiff,)	Case No. 4:15-cv-01008 CAJ
)	
vs.)	
)	
TONY LEVETTE PORTER,)	
)	
Defendants.)	

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL
DUE TO CONFLICT OF INTEREST

COMES NOW Nicole Gorovsky, and Kenneth Chackes, of the law firm of Chackes, Carlson and Gorovsky, LLP, and hereby move for leave to withdraw as counsel for Defendant N.M. in the above-referenced matter due to a conflict of interest.

Counsel has come to believe that a very strong potential conflict of interest has arisen in this case that requires withdrawal according to Missouri Rule of Professional Conduct 4-1.7(a)(2) which states:

a) Except as provided in Rule 4-1.7(b), a lawyer shall not represent a client if the representation involves a concurrent conflict of interest. A concurrent conflict of interest exists if:

- (1) the representation of one client will be directly adverse to another client; or
- (2) there is a significant risk that the representation of one or more clients will be materially limited by the lawyer's responsibilities to another client, a former client, or a third person or by a personal interest of the lawyer.

Defendant N.M has secured new counsel and therefore will be ably represented in this matter.

Nicole Gorovsky and Ken Chackes hereby certify, in compliance with Missouri Supreme Court Rule 4-1.16, that good cause exists for this withdrawal; namely, a conflict of interest for the law firm of Chackes, Carlson & Gorovsky, LLP, and its individual lawyers. This withdrawal will have no material adverse effect on Defendant N.M's interests as Defendant N.M. will continue to be represented by competent counsel.

Dated: July 28, 2016

Respectfully Submitted,

CHACKES, CARLSON & GOROVSKY LLP

/s/ Kenneth M. Chackes

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 28th day of July, 2016, the foregoing was filed electronically with the Clerk of Court, therefore to be served electronically by operation of the Court's electronic filing system, upon all attorneys of record.

/s/ Kenneth M. Chackes